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January 28, 2025

VIA ECF

Honorable Cathy L. Waldor, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

**Re: *In re Selenious Acid Litigation,*
 No. 2:24-cv-07791-BRM-CLW (Consolidated)**

Dear Judge Waldor:

We, along with Sterne, Kessler, Goldstein & Fox P.L.L.C., represent Plaintiff American Regent, Inc. ("ARI") in the above-referenced matter. With counsel for all Defendants in the above-referenced consolidated matter, we submit the attached Discovery Confidentiality Order for the Court's consideration. If Your Honor finds this document acceptable, the parties respectfully request that Your Honor "So-Order" the document and direct its entry on the docket.

The parties thank the Court for its consideration and assistance in this matter. If the Court would like to discuss this matter further, the parties will make themselves available at the Court's convenience.

Respectfully submitted,

s/ Charles H. Chevalier
Charles H. Chevalier

Attachment

cc: Counsel of record via ECF and e-mail